

ECONOMIC BENEFIT REVIEW CHECKLIST
TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION

Case Number: Division: APC12-0194, -0195, -0196

Respondent Name: IMI South, LLC 63-0303, 63-0304, 81-0036

CHECKLIST

- ☐ Respondent failed to install or delayed installation of necessary process control or pollution control equipment
- ☐ Respondent altered process or pollution controls resulting in inadequately treated discharge/emission
- ☐ Respondent failed to follow required or approved plans or procedures relating to construction, operation, or maintenance of facility or system
- ☐ Respondent avoided cost of permit, license, certification, or other authorization
- ☐ Respondent avoided cost of proper disposal
- ☐ Respondent failed to conduct required monitoring, testing, or sampling
- ☐ Respondent otherwise delayed cost of compliance (briefly describe)

- ☐ Respondent otherwise avoided cost of compliance (briefly describe)

SUMMARY

- ☐ Recommend economic benefit assessment be included in penalty calculation
- ☒ Recommend economic benefit assessment NOT be included in penalty calculation.
Reason for not pursuing economic benefit penalties:
- ☐ Determined no significant economic benefit gained through non-compliance
 - ☒ Economic benefit cannot be substantiated
 - ☐ Inputs for TN-BEN model cannot be practically determined
 - ☐ Other (describe) _____

Preparer initials: DSW

Date: 9-5-12

Reviewer/Supervisor initials: _____

Date: _____

ATTACH THIS COMPLETED CHECK LIST TO PENALTY CALCULATION WORKSHEET